

E-Filed 4/27/10

1 JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

2 BRIAN J. STRETCH (CABN 163973)
Chief, Criminal Division

4 CHRISTINE Y. WONG (NYBN 3988607)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102
7 Telephone: (415) 436-7301
Facsimile: (415) 436-6753
8 E-Mail: Christine.Wong@usdoj.gov

Attorneys for the United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13
14 UNITED STATES OF AMERICA) No. 09-0749 RS
15 v.)
16 CHRISTOPHER BRYAN ABLETT,)
17 Defendant.)
18 _____)
19)
20
21
22 On April 21, 2010, defendant Christopher Bryan Ablett appeared before the Court for a
23 status conference. Based on the parties' request for additional time to conduct investigation,
24 review/produce discovery, and to file motions, the Court set a motions hearing/status conference
25 for June 15, 2010. The parties requested, and the Court ordered that the exclusion of time under
26 the Speedy Trial Act so that the defendant could review discovery, conduct an independent
27
28

STIPULATION AND [PROPOSED]
ORDER DOCUMENTING WAIVER

On April 21, 2010, defendant Christopher Bryan Ablett appeared before the Court for a status conference. Based on the parties' request for additional time to conduct investigation, review/produce discovery, and to file motions, the Court set a motions hearing/status conference for June 15, 2010. The parties requested, and the Court ordered that the exclusion of time under the Speedy Trial Act so that the defendant could review discovery, conduct an independent

1 investigation, and prepare motions to be filed.¹ The parties agree that, given the possibility of a
2 sentence of death in this case, this case qualifies as an “unusual” or “complex” case under 18
3 U.S.C. § 3161(h)(7)(B)(i).

4 With the agreement of the parties and with the consent of the defendant, the Court
5 enters this order confirming the exclusion of time under the Speedy Trial Act from April 21,
6 2010, through June 15, 2010. The parties agree and stipulate, and the Court finds and holds, as
7 follows:

8 The ends of justice served by excluding the period from April 21, 2010, to June 15, 2010,
9 from Speedy Trial Act calculations outweighs the interests of the public and the defendant to a
10 speedy trial, by ensuring the effective preparation of counsel, in accordance with 18 U.S.C. §
11 3161(h)(7)(A) and (B).

12 STIPULATED:

13

14 DATED: April 27, 2010

/s/
RICHARD MAZER, ESQ.
Attorney for CHRISTOPHER BRYAN ABLETT

16

17 DATED: April 27, 2010

/s/
CHRISTINE Y. WONG
Assistant United States Attorney

19

20 IT IS SO ORDERED.

21

22 DATED: April 27, 2010


HON. RICHARD SEEBORG
United States District Judge

24

25 _____
26 ¹On April 23, 2010, defendant filed a motion to dismiss. Under 18 U.S.C. Section
27 3161(h)(1)(D), time is excluded from Speedy Trial Act calculations from the date the motion was
28 filed until the conclusion of the hearing on the motion, currently scheduled for June 15, 2010.
Nonetheless, out of an abundance of caution, the parties seek an order excluding the period from
April 21, 2010, to June 15, 2010.